

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

IN RE:

TERRY ADAMS

CASE NO.: 18-12476-JDW

DEBTOR

CHAPTER 13

**APPLICATION FOR ALLOWANCE AND PAYMENT
OF CONTINGENCY FEES AND EXPENSES**

COMES NOW, Debtor, by and through Special Counsel D. Reid Wamble (collectively referred to as "Special Counsel"), and files this Application for Allowance and Payment of Contingency Fees and Expenses and in support thereof states as follows:

1. On or about December 3, 2015, Terry Adams (the "Debtor") was involved in a motor vehicle collision which resulted in damages and personal injuries. A lawsuit was filed by the Debtor against Mary Patterson and American Insurance Company.

2. Special Counsel has, among other things, initiated and pursued and conducted substantial negotiations, and researched legal and factual issues.

3. As a result of these efforts, a settlement of the claim against Mary Patterson and American Insurance Company has been reached, whereby American Insurance Company has agreed to pay to the Debtor the sum of \$17,400.00 in full and complete settlement of said claim and cause of action.

4. Special Counsel and Debtor previously agreed to attorney compensation on contingency basis of 40% of any amount recovered plus expenses, in pursuing the case against Mary Patterson and American Insurance Company.

5. A 40% attorney's fee from the settlement amount is \$6,960.00, plus \$3,262.38 in expenses, represents a total compensation and reimbursement of \$10,222.38.

The expenses incurred are reasonable and were necessary and are itemized as follows:

The Law Office of D. Reid Wamble, attorney compensation:	\$6,960.00
The Law Office of D. Reid Wamble, expense reimbursement:	\$3,262.38
1/3 Marshall County Circuit Court Clerk	\$ 53.33
1/3 Travel Expenses	\$ 114.67
1/3 Holly Springs Police Department	\$ 4.00
1/3 Mississippi Department of Insurance	\$ 8.33
1/3 Metro Process Service	\$ 15.00
1/3 Advanced Court Reporting	\$ 224.55
1/3 4,048 Copies, Scans and Prints @ \$.25 Per Page	\$ 337.33
1/3 File/Trial Supplies	\$ 50.00
1/3 Legal Research	\$ 42.00
1/3 Postage/Shipping	\$ 49.59
1/3 Communication Expenses	\$ 33.33
1/3 PPS&I Process Service	\$ 47.80
1/2 Dr. William Smith, M.D.	\$ 800.00
1/2 Alpha Court Reporting	\$ 628.47
1/2 MRI Productions, Inc.	\$ 631.98
Healthport (Medical Records)	\$ 197.00
Alliance Healthcare (Medical Records)	\$ 25.00
TOTAL EXPENSES	\$ 3,262.38

Flexworx (Payment in Full for Medical Lien)	\$ 529.20
Progressive Rehab (Payment in Full for Medical Lien)	\$ 1,927.80

6. The parties request that this Court approve the request for compensation \$10,222.38 and expense reimbursement to be paid to Special Counsel, \$529.20 to Flexworx and \$1,927.80 to Progressive rehab for medical liens.

7. Upon approval of this application, all settlement proceeds of \$17,400.00 to be disbursed as follows:

The Law Office of D. Reid Wamble, attorney compensation:	\$6,960.00
The Law Office of D. Reid Wamble, expense reimbursement:	\$3,262.38
1/3 Marshall County Circuit Court Clerk	\$ 53.33
1/3 Travel Expenses	\$ 114.67

1/3 Holly Springs Police Department	\$	4.00
1/3 Mississippi Department of Insurance	\$	8.33
1/3 Metro Process Service	\$	15.00
1/3 Advanced Court Reporting	\$	224.55
1/3 4,048 Copies, Scans and Prints @ \$.25 Per Page	\$	337.33
1/3 File/Trial Supplies	\$	50.00
1/3 Legal Research	\$	42.00
1/3 Postage/Shipping	\$	49.59
1/3 Communication Expenses	\$	33.33
1/3 PPS&I Process Service	\$	47.80
½ Dr. William Smith, M.D.	\$	800.00
½ Alpha Court Reporting	\$	628.47
½ MRI Productions, Inc.	\$	631.98
Healthport (Medical Records)	\$	197.00
Alliance Healthcare (Medical Records)	\$	25.00
TOTAL EXPENSES	\$	3,262.38
Flexworx (Payment in Full for Medical Lien)	\$	529.20
Progressive Rehab (Payment in Full for Medical Lien)	\$	1,927.80
Trustee and bankruptcy estate:	\$	4,720.62

8. In addition to the approval of this application, the parties hereto request that this Court approve the distribution of funds as provided for above. From the funds received by Trustee, timely filed and allowed general unsecured claims should be paid a pro-rata distribution. Trustee should be allowed her statutory compensation.

15. Counsel, D. Reid Wamble, and prays that upon notice and hearing that this Court enter its order approving this application and for such other relief to which the parties hereto and this bankruptcy estate may be entitled.

Respectfully submitted this the 12th day of November 2019

BY: /s/D. Reid Wamble

**D. REID WAMBLE
THE LAW OFFICE OF D. REID WAMBLE, PLLC
P.O. BOX 1950
OLIVE BRANCH, MISSISSIPPI 38654
rw9516@aol.com
TEL: (662) 893-2126
FAX: (662) 890-5686
MSB# 9516**